

Customer No.: 31561  
Docket No.: 12790-US-PA  
Application No.: 10/709,609

### REMARKS

#### Present Status of the Application

Claim 7 is objected due to informalities. Applicant has amended "extractor" in claim 7 and claim 2 to overcome the objection.

The Office Action rejects claims 1-10 under 35 U.S.C. 103(a) as being unpatentable over Pattisam et al, (US 5,357,614) and further in view of Karpoff (US 6,857,059). Claims 1-10 remain pending in the present application, and reconsideration of those claims is respectfully requested.

#### Discussion of Claim Rejections under 35 USC 103

Applicant respectfully traverses the rejection of claims 1 under 35 U.S.C. 103 (a) as being unpatentable over Pattisam et al, (US 5,357,614) and further in view of Karpoff (US 6,857,059) because a *prima facie case of obviousness* has not been established by the office action.

With respect to independent claim 1,

1. A data compression/decompression device, suitable for compressing/decompressing a data transmitted between a data generation device and a data storage device, comprising:
  - an input buffer, for buffering and storing said data for input;
  - an output buffer, for buffering and storing said data for output;
  - a data compressor/decompressor, coupled to said output buffer, for

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compressing/decompressing said data for input and storing said data for output in said output buffer; and

a controller, coupled to said input buffer, said output buffer and said data compressor/decompressor, for controlling data transmission with said data generation device and said data storage device, controlling compressing/decompressing said data, (Col.2, Lines 50-52) and managing an address mapping table which is the cross reference between an access address transmitted from said data generation device and a physical address of storing the data in said data storage device. (*Emphasis added*)

Applicants respectfully assert that Pattisam et al. in view of Karpoff et al. is legally deficient for the purpose of rendering claims 1-10 unpatentable for at least the reason that not every element of the claim was taught or suggested by cited references such that the invention as a whole would have been obvious to one of ordinary skill in the art. The present invention specifically teaches a data compression/decompression device, suitable for compressing/decompressing a data transmitted between a data generation device and a data storage device with the cross reference address mapping table feature thereon. In contrast, Pattisam demonstrates in Col 15, Lines 41-45, that "Microprocessor 230 also issues starting and ending addresses to SCSI interface logic 260 such that the data are transferred directly from compressed data buffers 250 to device 280". Pattisam further illustrates (Col 12, Line 63 – Col 13, Line 1), "the SCSI controller interface logic 260 further identifies to the SCSI controller 270

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the **starting and ending addresses** of the data located in the compressed data buffers 250 which are ready to be transferred to the external device 280.....". In particular, Pattisam relied on SCSI controller interface for transmitting data to the external device 280 and the SCSI controller 270 **the starting and ending address** to control data transmission. It is evident that Pattisam's teaching deviates from the scope of the present invention which utilized the "cross reference between an access address transmitted from said data generation device and a physical address of storing the data in said data storage device". Both differ in a way that the data is transmitted via different methods, cross reference mapping vs. SCSI controller interface. After all, the present invention's cross reference mapping technique reckons on its implementation robustness on most of the computer's interface system whereas, Pattisam's invention depends on the SCSI controller interface in order to operate.

Moreover, the examiner induces **data compression coprocessor**, element 220 of Pattisam (Col 2, Lines 50-52, which states "when compressed data from an external device is received in a second buffer, the compression coprocessor decompresses the data and outputs the decompressed data through the buffer to the host) to contrast with the **data compressor/decompressor**, element 233, of the present invention. In particular, element 220 of Pattisam in Claim 1 asserts that, "compression coprocessor interface means coupled to said compression coprocessor for initiating transfer of one of said data of first and second formats into said compression coprocessor, said compression coprocessor interface means also causing the output of said compression coprocessor to be coupled to one of said second and first buffer

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means, respectively, said compression coprocessor interface means monitoring said compression coprocessor and transferring said first completion interrupt when said compression coprocessor is completed." All this presents a compression coprocessor uses two different formats to operate; yet it does not disclose and teach the cross-reference address mapping method.

Even so, Karpoff et al. solely teaches a storage virtualization architecture with address mapping table feature thereon. If, however, Pattisam is forced to incorporate "address mapping table" feature therein, it violates the principle and destroys the synergism of a true invention. Hence, Pattisam and Karpoff are not combinable since both inventions are mutually exclusive to reach different solutions to a problem.

For at least the foregoing reasons, applicant respectfully submits that independent claims 1 is patently defined over the prior art references, and should be allowed. Furthermore with independent claim 5 which defines an applicable system related to claim 1 is also in condition for allowance. Thus, with regards to Claims 2-4 and 6-10 which dependent upon claims 1 and 5 respectively, are patentable as well.

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**CONCLUSION**

For at least the foregoing reasons, it is believed that the pending claims 1-10 are in proper condition for allowance and an action to such effect is solemnly assured. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is gratefully invited to call the undersigned.

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Respectfully submitted,

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